

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

EDWARD ROBERT LICHWICK, JR.,

Plaintiff,

– against –

VERIZON,

Defendant.

Civil Action No.: 08-CIV-3892 (SCR)

ECF CASE

**DECLARATION OF ROSALYNN CHRISTIAN  
IN FURTHER SUPPORT OF DEFENDANT’S MOTION TO DISMISS**

I, Rosalynn Christian, declare, pursuant to 28 U.S.C. §1746 and under penalty of perjury under the laws of the United States of America that the following is true and correct:

1. I submit this declaration in further support of Verizon Pennsylvania’s (“Verizon PA”) motion to dismiss the Complaint in the above-captioned matter.

2. I am currently employed by Verizon Corporate Services Group Inc. as a Specialist – Legal Support, and I have held this position since 1994. In this position, I am responsible for corporate governance for various corporate affiliates and entities including Verizon North Inc. (“Verizon North”).

3. Verizon North is a wholly-owned subsidiary of GTE Corporation (“GTE”), a New York corporation that is headquartered in New York.

4. GTE Corporation is owned in part by Verizon Communications Inc. ("VCI") (92.88%), a Delaware Corporation that is headquartered in New York. GTE Corporation is also owned, in part, by NYNEX Corporation (5.93%) and Bell Atlantic Global Wireless, Inc. (1.19%).

5. Verizon North is a telephone company that provides local, exchange access, intrastate and interstate toll telephone services to customers.

6. Verizon North has its own separate officers and directors, although some of its officers also may be officers of, and some of its directors also may be directors of, VCI.

7. I am an officer of, and the Assistant Secretary for, Verizon North.

8. Verizon North is incorporated in Wisconsin with a principal business address of 8001 West Jefferson Boulevard, Fort Wayne, Indiana 46804.

9. Verizon North is qualified or registered to do business in Alabama, Illinois, Indiana, Kentucky, Michigan, Missouri, Ohio, Pennsylvania, Texas, and West Virginia. Verizon North is not qualified or registered to do business in New York.

10. Verizon North has its own employees, who are not employees of VCI.

Dated: August 21, 2008

  
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Rosalynn Christian

**CERTIFICATE OF SERVICE**

I hereby certify that on August 25, 2008, the foregoing was filed with the Clerk of the Court and served via overnight delivery in accordance with the Federal Rules of Civil Procedure, and/or the Southern District's Local Rules, and/or the Southern District's Rules on Electronic Service upon:

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